



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

May 17, 2005

Certified Mail No. 7000 1670 0013 8129 0027

Craig Cozad, President
Coeur d'Alene Paving, Inc.
120 E. Anton Ave.
Coeur d'Alene, ID 83815

RE: Facility ID No. 777-00357, Coeur d'Alene Paving, Inc., Portable
Final Permit Letter

Dear Mr. Cozad:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) Number P-050107 to Coeur d'Alene Paving, Inc. for the construction of a portable hot-mix asphalt facility in accordance with IDAPA 58.01.01.200 through 228 (*Rules for the Control of Air Pollution in Idaho*)(Rules).

This permit is based on your permit application received April 8, 2005. This permit is effective immediately and replaces PTC No. 777-00205 issued June 10, 1997 to Quad Cities Construction.

This permit does not release Coeur d'Alene Paving, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Coeur d'Alene Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers, Regional Permit Program Coordinator, at (208) 373-0502, or wrogers@deq.state.gov, to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/BR/sd
Enclosures

Permit No. P-050107

c: Tom Harman, Coeur d'Alene Regional Office
 Bill Rogers, Permit Coordinator
 Marilyn Seymore/ Pat Rayne, Air Quality Division
 Laurie Kral, US EPA Region 10
 Permit Binder
 Source File
 Phyllis Heitman (Ltr Only)
 Reading File (Ltr Only)



**Air Quality
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: P-050107

FACILITY ID No.: 777-00357

AQCR:

CLASS: SM

SIC: 2951

ZONE:

UTM COORDINATE (km): Portable

1. PERMITTEE

Coeur d'Alene Paving, Inc.

2. PROJECT

Permit to Construct Revision – Portable Hot-mix Asphalt Facility

3. MAILING ADDRESS

120 E. Anton Avenue

CITY

Coeur d'Alene

STATE

ID

ZIP

83815

4. FACILITY CONTACT

Craig Cozad

TITLE

President

TELEPHONE

208-762-0235

5. RESPONSIBLE OFFICIAL

Craig Cozad

TITLE

President

TELEPHONE

208-762-0235

6. EXACT PLANT LOCATION

Portable

COUNTY

Portable

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Hot-mix asphalt production

8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.


**TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY**

DATE ISSUED: May 17, 2005

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Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
CFR	Code of Federal Regulations
CO	carbon monoxide
°F	degrees Fahrenheit
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
ft	foot
gr	grain (1 lb = 7,000 grains)
gr/dscf	grains per dry standard cubic foot
hr/day	hours per day
hr/yr	hours per any consecutive 12-month period
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
kW	kilowatt
MMBtu/hr	million British thermal units per hour
O&M	Operations & Maintenance
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PERF	Portable Equipment Relocation Form
PTC	permit to construct
SIC	Standard Industrial Classification
SM	synthetic minor
T/day	tons per day
T/hr	tons per hour
T/mo	tons per month
T/yr	tons per any consecutive 12-month period
UTM	Universal Transverse Mercator

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050107

Permittee:	Coeur d'Alene Paving, Inc.	Facility ID No. 777-00357	Date Issued:	May 17, 2005
Location:	Portable			

1. PERMIT TO CONSTRUCT SCOPE**Purpose**

- 1.1 This Permit to Construct (PTC) is a revision of an existing PTC. Specifically, the revision is a facility name change and change in ownership. This facility was formerly owned and operated by Quad Cities Construction, Inc.
- 1.2 This PTC revises PTC No. 777-00205, issued June 10, 1997, the terms and conditions of which shall no longer apply.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Portable Hot-mix Asphalt Plant Type: Drum mix Maximum throughput capacity: 400 T/hr Allowable burner fuel: Natural gas or propane gas Maximum burner heat capacity: 120 MMBtu/hr Stack height (ft): 44.3 Stack diameter (ft): 5.16 Exhaust gas flowrate (acfm): 77,000 Exhaust gas temperature (°F): 300	Baghouse Control Device Manufacturer: CMI Model No.: RA-418P
3	Electrical Generator Allowable output capacity: 635 kW Allowable fuel type: distillate fuel oil, natural gas, propane gas Stack height (ft): 12.2 Stack diameter (ft): 0.67 Exhaust gas flowrate (acfm): 4,958 Exhaust gas temperature (°F): 1,007	Emissions are uncontrolled

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2. PORTABLE HOT-MIX ASPHALT PLANT**2.1 Process Description**

This portable hot-mix asphalt plant combines graded aggregates and oil to produce asphaltic concrete.

2.2 Emissions Control Description

PM₁₀ emissions from this portable hot-mix asphalt plant are controlled by a baghouse. All other emissions are uncontrolled.

Table 2.1 EMISSIONS UNIT

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Drum dryer	Baghouse	Baghouse stack

Emissions Limits**2.3 Asphalt Dryer Emissions Limits**

Particulate matter (PM) emissions from the hot-mix asphalt dryer stack shall not exceed 0.04 grains per dry standard cubic foot (gr/dscf), shall not exhibit 20% opacity, or greater, nor shall PM or carbon monoxide (CO) emissions from the hot-mix asphalt dryer stack exceed any corresponding emissions rate limits listed in the appendix. Opacity shall be determined using the procedures contained in IDAPA 58.01.01.625.04.

2.4 Other Particulate Matter Emissions Limits

Gases from systems for screening, handling, storing, and weighing hot aggregate, which emanate from a stack, vent, or other functionally equivalent opening, shall not exhibit 20% opacity, or greater. Opacity shall be determined using the procedures contained in IDAPA 58.01.01.625.04.

2.5 Opacity Limit

Emissions from the hot-mix asphalt dryer exhaust stack shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625 (Rules for the Control of Air Pollution in Idaho). Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

2.6 Visible Emissions Limit at Property Boundary

Fugitive emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60-minute period. Visible emissions shall be determined by EPA Method 22, 40 CFR 60, Appendix A, or a DEQ-approved alternative method.

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Operating Requirements

2.7 Hot-mix Asphalt Production Rate Limits

2.7.1 PM₁₀ Attainment or Unclassifiable Areas

The production rate of the hot-mix asphalt plant shall not exceed 3,148,440 tons per any consecutive 12-month period (T/yr) when operating in any PM₁₀ attainment or unclassifiable area.

2.7.2 PM₁₀ Nonattainment Areas

- The production rate of the hot-mix asphalt plant shall not exceed 6,258 tons per day (T/day) when operating in any PM₁₀ nonattainment area or proposed PM₁₀ nonattainment area.
- The production rate of the hot-mix asphalt plant shall not exceed 2,284,147 tons per any consecutive 12-month period (T/yr) when operating in any PM₁₀ nonattainment area or proposed PM₁₀ nonattainment area.

2.8 Dryer Burner Fuel Limits

The burner fuel shall be natural gas or propane only.

2.9 Control of Fugitive Emissions

Fugitive emissions from the hot-mix asphalt facility shall be controlled in accordance with IDAPA 58.01.01.650-651, and IDAPA 58.01.01.808.

Reasonable controls may include, but are not limited to, the following:

- Use of water or environmentally safe chemicals
- Application of dust suppressants
- Use of control equipment
- Covering of trucks
- Paving
- Prompt removal of earth or other stored materials

2.10 Air Stagnation and/or Degraded Air Quality

The permittee shall comply with operating restriction during periods of atmospheric stagnation and/or degraded air quality as required by IDAPA 58.01.01.550, Air Pollution Emergency Rule.

2.11 Pressure Drop Monitoring Equipment

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer's specification, equipment to continuously measure the pressure differential across the baghouse.

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2.12 Operations and Maintenance Manual Requirements

Within 60 days of issuance of this permit, the permittee shall have developed an Operations and Maintenance (O&M) manual for the baghouse which describes the procedures that will be followed to comply with General Provision 5.2 and the air pollution control device requirements contained in this permit. The manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

2.13 Baghouse Pressure Drop

The pressure drop across the baghouse shall be maintained within the manufacturer's and O&M manual's specifications. Documentation of both the manufacturer's and O&M manual's operating pressure drop specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

Monitoring and Recordkeeping Requirements

2.14 Operating Parameters

The following operating parameters shall be monitored and recorded. Records of this information shall be kept on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

- Hot-mix asphalt production in tons per month (T/mo) and tons per any consecutive 12-month period (T/yr) when operating in any PM₁₀ attainment or unclassifiable area.
- Hot-mix asphalt production in tons per day (T/day) and tons per any consecutive 12-month period (T/yr) when operating in any PM₁₀ nonattainment area or proposed PM₁₀ nonattainment area.

2.15 Baghouse Pressure Drop Monitoring and Recordkeeping

The permittee shall monitor and record the pressure drop across the baghouse one per day when in operation. Records of this information shall be kept on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

2.16 Reasonable Control Measures

The permittee shall monitor and record, during operation, the periodic method(s) used to reasonably control fugitive emissions from this facility. The records shall include the type of control used (i.e. water, environmentally safe chemical dust suppressants, etc.), as well as the circumstances under which no controls are used. Records of this information shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

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2.17 Performance Test

Within 60 days after achieving the maximum production rate at which the hot-mix asphalt plant will be operated, but not later than 180 days after startup, the permittee shall conduct a performance test, in accordance with the test methods and procedures contained in IDAPA 58.01.01.157, to measure PM emissions from the hot-mix asphalt plant exhaust stack to demonstrate compliance with Permit Conditions 2.3, 2.4, and 2.5.

A performance test shall be conducted no less than once every five years from the issuance date of this permit to demonstrate compliance with Permit Conditions 2.3, 2.4, and 2.5.

2.18 Performance Test Protocol

The permittee shall submit a performance test protocol to DEQ for approval at least 30 days prior to the test date.

2.19 Performance Test Report

The permittee shall submit a written report containing the results of the performance test required by Permit Condition 2.17. The report shall be submitted within 30 days after the date on which the performance test is concluded.

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3. ELECTRICAL GENERATOR**3.1 Process Description**

An electrical generator is used to provide power to the hot-mix asphalt plant when line power is not available. The generator has a rated output capacity of 635 kilowatts and can be fueled with distillate fuel oil, natural gas, or propane gas.

3.2 Emissions Control Description

Emissions from the electrical generator are uncontrolled.

3.3 Electrical Generator Emissions Limits

Carbon monoxide (CO) emissions from the electrical generator stack shall not exceed any corresponding emissions rate limits listed in the appendix.

3.4 Opacity Limit

Emissions from the electrical generator stack, or any other stack, vent, or functionally equivalent opening associated with this facility shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements**3.5 Electrical Generator Allowable Operating Parameters**

- The maximum output capacity shall not exceed 635 kW.
- The generator fuel shall be distillate fuel oil, natural gas, or propane gas.
- The generator operations shall not exceed 7,871 hours per any consecutive 12-month period (hr/yr) when operating in any PM₁₀ attainment or unclassifiable area.
- The generator operations shall not exceed 15.5 hours per day (hr/day) or 5,710 hours per any consecutive 12-month period (hr/yr) when operating in any PM₁₀ nonattainment area or proposed PM₁₀ nonattainment area.

3.6 Distillate Fuel Oil Sulfur Content Limits

The permittee shall not sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade 1 fuel oil - 0.3% by weight.
- ASTM Grade 2 fuel oil - 0.5% by weight.

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Monitoring and Recordkeeping Requirements**3.7 Operating Parameters**

The following operating parameters shall be monitored and recorded. Records of this information shall be kept on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

- Hours of operation of the electrical generator in hours per month (hr/mo) and hours per any consecutive 12-month period (hr/yr) when operating in any PM₁₀ attainment or unclassifiable area.
- Hours of operation of the electrical generator in hours per day (hr/day) and hours per any consecutive 12-month period (hr/yr) when operating in any PM₁₀ nonattainment area or proposed PM₁₀ nonattainment area.
- The permittee shall demonstrate compliance with the fuel oil sulfur content limits by obtaining documentation of the sulfur content analysis for each shipment of fuel oil on an as-received basis.

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4. APPENDIX**Coeur d'Alene Paving, Inc.****Portable Hot-mix Asphalt Facility****Hourly (lb/hr) and Annual (T/yr) Emissions Limits^a**

Source Description	PM	CO
	lb/hr	T/yr
Drum dryer stack	15.04	88.16
Electrical generator stack	---	10.84

- a. As determined by a pollutant-specific U.S. EPA reference method, DEQ-approved alternative, or as determined by the DEQ's emission estimation methods used in the permit application analysis.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050107

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5. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within 5 working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050107

Permittee:	Coeur d'Alene Paving, Inc.	Facility ID No. 777-00357	Date Issued:	May 17, 2005
Location:	Portable			

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.\
9. At least 10 days prior to relocating, the permittee shall register any portable equipment covered by this permit using DEQ's Portable Equipment Registration and Relocation Form (PERF) available on the DEQ's Website at: www.state.id.us/deq/air/equiprelocat.html. Each PERF, along with a scaled plot plan of the relocation site, shall be mailed to the following address:

PERF Processing Unit
Idaho DEQ - Air Quality
2110 Ironwood Pkwy.
Coeur d'Alene, ID 83814